

AO 106 (Rev. 7/10) Affidavit for Search  
Warrant

AUSA Michael Maione, (312) 353-4258

**FILED**  
**2/5/2025**

UNITED STATES DISTRICT COURT

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case No. 25M76

the United States Mail package bearing tracking  
number 9505 5161 9125 5034 9849 74, further  
described in Attachment A

Ref. No.

**APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT**

I, Patrick Kelly, a Task Force Officer of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

**See Attachment A**

located in the Northern District of Illinois, there is now concealed:

**See Attachment B**

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, fruits and contraband.

The search is related to a violation of:

*Code Section**Offense Description*

Title 21, United States Code, Sections 841 and 843(b)

Use of a communication facility to commit narcotics offenses

The application is based on these facts:

**See Attached Affidavit,**

Continued on the attached sheet.

*Patrick Kelly**Applicant's Signature*PATRICK KELLY, Task Force Officer  
U.S. Postal Inspection Service*Printed name and title*

Pursuant to Fed. R. Crim. P. 4.1, this Application is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the statements in the Application and Affidavit by telephone.

Date: February 5, 2025*Heather K. McShain**Judge's signature*City and State: Chicago, IllinoisHEATHER K. MCSHAIN, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT            )  
  )  
NORTHERN DISTRICT OF ILLINOIS         )

**AFFIDAVIT**

I, Patrick Kelly, being duly sworn, state as follows:

1. I am a Task Force Officer with the U.S. Postal Inspection Service (“USPIS”). I have been so employed since approximately April 2022.

2. As part of my duties as a USPIS Task Force Officer, I investigate criminal violations of federal laws relating to the mails and to controlled substances, including violations of Title 21, United States Code, Sections 841, 843, and 846.

3. This affidavit is made in support of an application for a warrant to search the United States Mail Parcel with Tracking Number 9505 5161 9125 5034 9849 74 described further in Attachment A (the “**Subject Parcel**”), for evidence, instrumentalities, fruits, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Sections 841 and 843(b) (the “**Subject Offenses**”).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence,

instrumentalities, fruits, and contraband of the **Subject Offenses**, are located within the **Subject Parcel**.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL**

5. On February 5, 2025, I inspected the **Subject Parcel** at the J.T. Weeker International Service Center in Chicago, Illinois. The **Subject Parcel** was first scanned by the United States Postal Service on February 3, 2025, in Downey, California, 90241, and is addressed to “Balenda Williams, 456 N. Lawndale, Chicago, IL 60624,” with a return address of “Jason Reef, 8021 5th Ave, Downey, CA, 90241.” According to law enforcement, the **Subject Parcel** bears \$19.15 in postage, measures approximately 11 inches by 8.5 inches by 6 inches, and weighs approximately 5 pounds 11 ounces.

6. I observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, I ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database and the sender name did not associate with the sender address. Based on my training and experience, a fictitious sender name can indicate that the sender does not want to be associated with the parcel.

8. The **Subject Parcel** originated from a state that is close to the United States’ southern border. Based on my training and experience, I am aware narcotics

are commonly smuggled into the United States across the southern land border. I am further aware that once narcotics arrive in the United States, they are often temporarily stored in states along the southern United States border prior to being further distributed, commonly via the United States Mail, to customers around the United States. As a result of this occurrence, many seizures of narcotics-laden parcels are from parcels that are sent from states close to the United States border.

9. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

10. On or about February 5, 2025, I arranged for a Rolling Meadows Police Department Canine Officer and his canine partner, "Scar," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Scar is certified annually by Illinois Law Enforcement Training and Standards Board as a narcotics dog. Scar was most recently re-certified on October 4, 2024. Scar is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, cannabis, methamphetamine, and other controlled substances that could be contained inside. Scar is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing.

11. In addition, according to USPIS records, Scar has successfully alerted to controlled substances and other items believed to have been in contact with controlled

substances, including United States currency, paraphernalia, and packaging, further described in Attachment B, in U.S. Mail Parcels and letters on 75 occasions since December 2024, with a success rate of approximately 92%. To the best of my knowledge, the Rolling Meadows Police Department does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPS success rate is available.

12. On or about November 14, 2023, at the J.T. Weeker International Service Center in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 7 other parcels in the workroom area. I then witnessed Scar examine the parcels and observed Scar sit/lay on the Subject Parcel. Scar did not alert to any of the other parcels. The Canine Officer informed me that Scar's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.


13. Additionally, based on my training and experience: (i) individuals who engage in the trafficking of illegal controlled substances often exchange cash through the mail; (ii) money that is handled by individuals who also handle drugs or is in the vicinity of drugs can retain the scent of drugs, which dogs can smell; and (iii) in other such cases, narcotics dogs have alerted to a package that has contained money.

## II. CONCLUSION

14. Based on the above information, I respectfully submit that there is probable cause to believe that the **Subject Offenses** have been committed, and that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct,

as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Patrick Kelly  
Task Force Officer  
U.S. Postal Inspection Service

Sworn to and affirmed by telephone 5th day of February, 2025

  
\_\_\_\_\_  
Honorable HEATHER K. MCSHAIN  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF ITEM TO BE SEARCHED**

The United States Postal Service Priority Mail Parcel with Tracking Number 9505 5161 9125 5034 9849 74, mailed on February 3, 2025, from Downey, California, 32435, and addressed to “Balenda Williams, 456 N. Lawndale, Chicago, IL 60624,” with a return address of “Jason Reef, 8021 5th Ave, Downey, CA, 90241” and bearing \$19.15 in postage, measuring approximately 11 inches by 8.5 inches by 6 inches, and weighing approximately 5 pounds 11 ounces.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED**

Evidence, instrumentalities, fruits, or contraband concerning violation of Title 21, United States Code, Sections 841 and 843(b) (the “**Subject Offenses**”), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency that constitutes evidence, fruits, or instrumentalities of the **Subject Offenses**;
4. Paraphernalia associated with the use, possession, manufacturing, packaging, processing, and distribution of controlled substances, including but not limited to adulterants, dilutants, cutting agents, scales, needles, grinders, heat-sealing devices, plastic bags, and money-counting devices; and
5. Items that identify the sender or intended recipient of the **Subject Parcel**.